

# EXHIBIT 1

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**From:** Jorge L. Piedra <jpiedra@kttlaw.com>  
**Sent:** Thursday, April 13, 2023 1:13 PM  
**To:** Levy, Joshua S. <JLevy@willkie.com>; Corali Lopez-Castro <clc@kttlaw.com>  
**Cc:** Michael Lorigas <mlorigas@kttlaw.com>; Cheney, Alexander <ACheney@willkie.com>; Lombardi, Stuart <slombardi@willkie.com>; Camara Fuertes, Roberto <rcamara@ferraiuoli.com>; Ricardo Casellas <RCasellas@cabprlaw.com>; Carla S. Loubriel Carrión <CLoubriel@cabprlaw.com>; Monica Ramos Benitez <mramos@ferraiuoli.com>  
**Subject:** RE: Womply v. Benworth (D.P.R.)

\*\*\* **EXTERNAL EMAIL** \*\*\*

Josh,

Benworth, Benworth PR, and Mr. and Mrs. Navarro do not agree to any of the three parts of your proposal below.

Sincerely,

Jorge L. Piedra, Esq. | Partner



KOZYAK TROPIN & THROCKMORTON

2525 Ponce de Leon Blvd., FL 9, Miami, FL 33134

Phone 305.372.1800 | Direct 305.728.2975 | Email [jpiedra@kttlaw.com](mailto:jpiedra@kttlaw.com)

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**From:** Jorge L. Piedra  
**Sent:** Wednesday, April 5, 2023 3:23 PM  
**To:** Levy, Joshua S. <[JLevy@willkie.com](mailto:JLevy@willkie.com)>; Corali Lopez-Castro <[clc@kttlaw.com](mailto:clc@kttlaw.com)>  
**Cc:** Michael Lorigas <[mlorigas@kttlaw.com](mailto:mlorigas@kttlaw.com)>; Cheney, Alexander <[ACheney@willkie.com](mailto:ACheney@willkie.com)>; Lombardi, Stuart <[slombardi@willkie.com](mailto:slombardi@willkie.com)>  
**Subject:** RE: Womply v. Benworth (D.P.R.)

We will do so at our convenience.

Jorge L. Piedra, Esq. | Partner

 KOZYAK TROPIN & THROCKMORTON

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Phone 305.372.1800 | Direct 305.728.2975 | Email [jpiedra@kttlaw.com](mailto:jpiedra@kttlaw.com)

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**From:** Levy, Joshua S. <[JLevy@willkie.com](mailto:JLevy@willkie.com)>

**Sent:** Wednesday, April 5, 2023 3:15 PM

**To:** Corali Lopez-Castro <[clc@kttlaw.com](mailto:clc@kttlaw.com)>

**Cc:** Jorge L. Piedra <[jpiedra@kttlaw.com](mailto:jpiedra@kttlaw.com)>; Michael Lorigas <[mlorigas@kttlaw.com](mailto:mlorigas@kttlaw.com)>; Cheney, Alexander <[ACHeney@willkie.com](mailto:ACHeney@willkie.com)>; Lombardi, Stuart <[slombardi@willkie.com](mailto:slombardi@willkie.com)>

**Subject:** RE: Womply v. Benworth (D.P.R.)

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Thanks Cori, we really appreciate it. Would you mind also reaching out to counsel for Benworth Puerto Rico to get back to us as well?

Regards,

Josh

**Joshua S. Levy**

**Willkie Farr & Gallagher LLP**

1875 K Street, N.W. | Washington, DC 20006-1238

Direct: [+1 202 303 1147](tel:+12023031147) | Mobile: [+1 516 680 5751](tel:+15166805751)

[jlevy@willkie.com](mailto:jlevy@willkie.com) | [vCard](#) | [www.willkie.com/bio](http://www.willkie.com/bio)

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**From:** Corali Lopez-Castro <[clc@kttlaw.com](mailto:clc@kttlaw.com)>

**Sent:** Wednesday, April 5, 2023 3:02 PM

**To:** Levy, Joshua S. <[JLevy@willkie.com](mailto:JLevy@willkie.com)>

**Cc:** Jorge L. Piedra <[jpiedra@kttlaw.com](mailto:jpiedra@kttlaw.com)>; Michael Lorigas <[mlorigas@kttlaw.com](mailto:mlorigas@kttlaw.com)>; Cheney, Alexander <[ACHeney@willkie.com](mailto:ACHeney@willkie.com)>; Lombardi, Stuart <[slombardi@willkie.com](mailto:slombardi@willkie.com)>

**Subject:** Re: Womply v. Benworth (D.P.R.)

**\*\*\* EXTERNAL EMAIL \*\*\***

Josh

I light off deadline to respond to motions to dismiss and upcoming holidays (Passover starting tonight), we agree to an extend the deadline to respond to the motions to dismiss for 2 weeks. I hope this helps. We will respond on other requests next week.

Cori

Coralí Lopez-Castro  
Kozyak Tropin & Throckmorton, LLP

This message may contain privileged or confidential information. If you are not the intended recipient, please immediately delete this message.

On Apr 5, 2023, at 11:48 AM, Levy, Joshua S. <[JLevy@willkie.com](mailto:JLevy@willkie.com)> wrote:

**CAUTION:** [This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

Cori,

We're reaching out about the pending motions to dismiss in the District of Puerto Rico litigation. As your team has noted in the Arbitration, the Easter and Passover holidays are coming up this week, which affects availability to work on briefing. We also think that these motions, which focus on the timing of the arbitral decision and service of process, can be resolved among the parties. We propose that (1) all parties agree to stay the litigation pending an interim decision by the Arbitrator in the ongoing Arbitration (*i.e.*, a decision on the merits of the arbitration hearing, not a final determination of attorneys' fees and costs), (2) defendants withdraw their motions to dismiss without prejudice, and (3) counsel accept service for Bernie and Claudia Navarro, which will avoid them having process servers serve them personally. Our local Puerto Rico counsel has reached out to Defendants' Puerto Rico counsel about this but has not yet heard back. In light of the upcoming holidays and briefing deadlines, we ask that you please get back to us by the end of the day today. I'm happy to discuss by phone if that would be helpful.

Regards,  
Josh

**Joshua S. Levy**  
**Willkie Farr & Gallagher LLP**  
1875 K Street, N.W. | Washington, DC 20006-1238  
Direct: [+1 202 303 1147](tel:+12023031147) | Mobile: [+1 516 680 5751](tel:+15166805751)  
[jlevy@willkie.com](mailto:jlevy@willkie.com) | <vCard> | [www.willkie.com/bio](http://www.willkie.com/bio)

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